## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

JPMORGAN CHASE, N.A., successor by merger to Chase Home Finance, LLC, successor)	Case No. 1:24-cv-478-MRD-LDA
by merger to Chase Manhattan Mortgage )	Case 110. 1.24-ev-4/0-MIKD-LDM
Corporation;	District Judge Melissa R. DuBose
Plaintiff,	Magistrate Judge Lincoln D. Almond
v. )	
ROBERT G. CARVER, J.R. a/k/a	
ROBERT G. CARVER, and	
LINDA A. CARVER;	
Defendants, )	
UNITED STATES OF AMERICA,	
JOHN B. ENNIS, and	
OCEANSIDE PROPERTIES LLC;	
Defendants/Parties in Interest.	

## PROPOSED SCHEDULING ORDER

The parties JP Morgan Chase, N.A., United States of America, and Oceanside Properties LLC, conferred by teleconference on January 10, 2025, and the same parties as well as John B. Ennis conferred by teleconference on January 17, 2025, pursuant to Rule 26(f) of the Federal Rules of Civil Procedure. The parties addressed the topics set forth in Rule 26(f) during that teleconference.

The parties propose the following discovery schedule:

	<u>Deadline</u>
Rule 26(a)(1) Initial Disclosures:	February 10, 2025
Completion of Fact Discovery:	June 2, 2025
Rule 26(a)(2) Expert Witness Disclosures:	The parties do not anticipate requiring expert witnesses.

The parties do not anticipate requiring any changes to the sequencing or limitations on discovery found in the Federal Rules of Civil Procedure. Pursuant to Fed. R. Civ. P. 5(b)(2)(E), the parties agree that service on a party who has so far made an appearance in this case may be made by email.

Respectfully Submitted,

/s/ Erika Vogel (with consent) ERIKA VOGEL Harmon Law Offices P.C. 150 California Street Newton, MA 02458 617-558-8427 (v) 617-243-4046 (f)

evogel@harmonlaw.com

Counsel for Plaintiff JP Morgan Chase, N.A.

DAVID A. HUBBERT Deputy Assistant Attorney General U.S. Department of Justice Tax Division

/s/ Daniel M. Caves DANIEL M. CAVES

Trial Attorney, Tax Division U.S. Department of Justice P.O. Box 55, Ben Franklin Station Washington, D.C. 20044

(202) 514-6058 | Fax: (202) 514-5238

Daniel.M.Caves@usdoj.gov

Counsel for Defendant/Party-in-Interest United States of America

/s/ Thomas J. Cronin (with consent) THOMAS J. CRONIN Nolan, Brunero, Cronin & Ferrara Ltd. 1070 Main Street

Of Counsel:

ZACHARY A. CUNHA United States Attorney

Coventry, RI 02816 401-828-5800 (v) 401-823-3230 (f) tjc@ndgrb.com

Counsel for Defendant/Party-in-Interest Oceanside Properties LLC

/s/ John B. Ennis (with consent)
JOHN B. ENNIS
1200 Reservoir Avenue
Cranston, RI 02920
jbelaw75@gmail.com

Pro se Defendant/Party-in-Interest

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 23, 2025, I filed the foregoing document with the Clerk of the Court through the Court's CM/ECF system, which will electronically serve all registered participants. I also hereby certify that I sent the foregoing document by Federal Express to the following non-CM/ECF users:

Robert G. Carver, Jr., a/k/a Robert G. Carver 15 Riviera Drive Narragansett, RI 02882 *Pro Se* 

Linda A. Carver 15 Avice Street Narragansett, RI 02882 *Pro Se* 

/s/ Daniel M. Caves
DANIEL M. CAVES
Trial Attorney, Tax Division
U.S. Department of Justice